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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 CHARLES WHITE, an individual,

Case No: 2:22-cv-01626-GMN-EJY

10 Plaintiff,

11 vs.

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY DEADLINES
 (Second Request)**

12 UNITED FINANCIAL CASUALTY COMPANY,
 a Foreign Corporation; DOE EMPLOYEES I-V and
 13 ROE COMPANIES I-V,
 14 Defendants.

15 Defendant UNITED FINANCIAL CASUALTY COMPANY, and Plaintiff CHARLES
 16 WHITE, through their respective counsel submit the foregoing stipulation and order to extend
 17 discovery deadlines pursuant to LR 26-4 as follows:

18 1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	11/30/2022
Defendant's Initial Rule 26(a) Disclosures	01/11/2023
Plaintiff's First Set of Interrogatories, Requests for Production and Requests for Admission to Defendant	01/26/2023
Defendant's First Set of Interrogatories, Requests for Admission and Requests for Production to Plaintiff	02/28/2023
Defendant's Answers to Plaintiff's First Set of Interrogatories, Requests for Production and Requests for Admission	03/29/2023
Plaintiff's Answers to Defendant's First Set of Interrogatories, Requests for Production and	03/30/2023

Item	Date Completed
Requests for Admission	
Defendant's Amended Answers to Plaintiff's First Set of Interrogatories	04/03/2023
Plaintiff's First Supplemental Rule 26(a) Disclosures	05/04/2023
Defendant's First Supplemental Rule 26(a) Disclosures	05/15/2023
Deposition of Plaintiff Charles White	05/31/2023

2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional Written Discovery;
- b) Deposition of Person(s) Most Knowledgeable for Defendant;
- c) Deposition(s) of percipient witnesses;
- d) Deposition(s) of treating physicians;
- e) Disclosure of expert witnesses; and
- f) Deposition(s) all expert witnesses.

3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on September 18, 2023 with Plaintiff's initial expert disclosures currently due by June 20, 2023 and Defendant's initial and rebuttal expert disclosures due by July 20, 2023. Although discovery has diligently progressed since the Scheduling Order was filed on January 6, 2023, additional time is required to work through scope and scheduling issues regarding the deposition of the Rule 30(b)(6) designee for Defendant. Additionally, Plaintiff's expert witness has requested additional time to prepare his report due to scheduling issues. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a 15 day extension of the discovery deadlines to allow for additional time to complete the remaining discovery.

4. Proposed Schedule for Completing Discovery

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

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Event	Former Deadline	New Deadline
Amend pleadings or add parties	June 20, 2023	July 5, 2023
Plaintiff's Initial Expert Designations	June 20, 2023	July 5, 2023
Defendant's Initial and Rebuttal Expert Designations	July 20, 2023	August 4, 2023
Plaintiff's Rebuttal Expert Designation	August 17, 2023	September 1, 2023
Discovery Cut-off	September 18, 2023	October 3, 2023
Dispositive Motions	October 18, 2023	November 2, 2023
Joint Pre-Trial Order	November 20, 2023	December 5, 2023

Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: June 20th, 2023

VAN LAW FIRM

By: /s/ Burke L. Huber
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DATED: June 20th 2023

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IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED: June 20, 2023